

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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GPIF-I EQUITY CO., LTD. and  
GPIF-I FINANCE CO., LTD.,

Plaintiffs,

v.

HDG MANSUR INVESTMENT SERVICES, INC.,  
HDGM ADVISORY SERVICES, LLC, and  
HAROLD D. GARRISON

Defendants.  
-----X

Case No. 13 Civ 547 (CM)

**DECLARATION OF FRANCIS J. EARLEY**

I, Francis J. Earley, hereby declare as follows:

1. I am an attorney at the law firm Mintz, Levin, Cohn, Ferris, Glovsky, and Popeo, P.C., where I represent Defendants HDG Mansur Investment Services, Inc., HDGM Advisory Services, LLC, and Harold D. Garrison in the above captioned action. I submit this declaration in support of the Defendants' Trial Memorandum of Law.

2. In support of Defendants' Trial Memorandum of Law, attached hereto are true and correct copies of the following documents:

Exhibit 1: Transcript of May 16, 2014 Final Pretrial Conference.

Exhibit 2: Excerpts from December 6, 2013 deposition of B. Reeve.

Exhibit 3: Excerpts from the December 12, 2013 deposition of I. Nelson.

Exhibit 4: Excerpts from December 4, 2013 deposition of D. Hazell.

Exhibit 5: Excerpts from the November 21, 2013 deposition of B. Reeve.

Exhibit 6: A copy of *Filho v. Safra Nat'l Bank of New York*, 2014 U.S. Dist. LEXIS 36187 (S.D.N.Y. Mar. 11, 2014).

Dated: New York, New York  
May 21, 2014

Respectfully submitted,

MINTZ LEVIN COHEN FERRIS GLOVSKY  
AND POPEO, P.C.

/s/ Francis J. Earley  
Francis J. Earley  
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